



March 4, 1983

EPA-ARWM/PMTS

MAR 09 1983

Region VII K.C., MO

Mr. J. C. Patterson
Section Manager
Environmental Pollution Control
McDonnell Douglas Corp.
Dept. 191C, Bldg. 102
Box 516
St. Louis, Missouri 63166

RE: Hazardous Waste Storage Permit Application

Dear Mr. Patterson:

The Department of Natural Resources has completed a technical review of your hazardous waste facility application and your letter of January 17, 1983, with attached amendments. We have found some deficiencies and offer the following comments.

- 1) After visiting the site and observation of the facility's emergency response equipment, the department agrees that off-site arrangements may not be necessary. However, the applicant should make a statement indicating compliance with 10 CSR 25-7.011(4)(D).
- 2) The leak detection system outlined in Section D of your application has been reviewed by the Division of Geology and Land Survey and the Waste Management Program. The following comments are offered:
 - a) The number and locations of the monitoring wells are adequate.
 - b) The construction of the monitoring wells doesn't seem to be according to procedures commonly used in the industry. Please justify the 0.5 inch vertical slots as these appear excessively wide. The 3/4 inch gravel should probably have some sand added. The top of the gravel pack should have been filled with granular bentonite and not pellets. Will there be some scheduled sampling of the monitoring wells just in case the sensing unit fails?
 - c) Pumping procedures to extract fuel if leakage occurs should be outlined in reference to the contingency plan.
- 3) The storage tanks designated as "Bldg. 28 Waste Tank" on page D-22 and "Bldg. 6 Waste Oil Tank" on page D-23 do not have overflow prevention equipment. Please address compliance with 10 CSR 25-7.050(4)(F). In addition, the inspection requirements of (4)(G) 1.A. should be discussed for these two tanks.
- 4) A separate letter will be sent to your attention concerning compliance with 10 CSR 25-7.011(8), the financial assurance mechanisms.

MISSOURI DEPARTMENT OF NATURAL RESOURCES
P.O. Box 1368 1915 Southridge Drive Jefferson City, Missouri 65102 (314) 751-3241

Christopher S. Bond Governor
Fred A. Lafser Director

Division of Environmental Quality
Robert J. Schreiber Jr., P.E. Director

Mr. J. C. Patterson
March 3, 1983
Page 2

Please address these comments as promptly as possible so that the department may maintain its review schedule. If you have any questions, please contact Joe Jansen of this office.

Sincerely,



John D. Doyle, P.E.
Chief, Technical Services Section
Waste Management Program

JDD:JJ:dr

cc: Mr. Bob Stewart, EPA ✓
St. Louis Regional Office